

MARK D. STERN, P.C.

34 LIBERTY AVENUE • SOMERVILLE, MA 02144 • (617) 776 4020 • FAX: (617) 776 9250 • email: markdsternpc@rcn.com

May 12, 2005

Nancy Frankel Pelletier
Robinson Donovan, P.C.
1500 Main Street - Suite 1600
Springfield, MA 01115

Re: Jean v. City of Asburnham Police Dept., et al.
By fax to 413 785 4658

Dear Ms. Pelletier:

I received your after hours letter of yesterday. Our depositions are properly noticed under the rules and the dates mutually agreed upon, and hence we intend to proceed with Walsh on Monday May 16th, Geoffrey the following Monday May 23rd, Brennan on June 2nd, Ahearn on June 17th, Hart on June 23rd; Baranowski on June 24th, Parons on June 27th, Wright on June 28th; and the Ashburnham Chief on June 29th and Chief Cloutier on June 30th.

We believe your objections are without any merit whatsoever and solely intended to cause undue delay, particularly in light of the difficulty we have had setting up deposition dates. You may set up a telephone conference if you like.

Cordially



Mark D. Stern

cc. by fax transmissions only
Andrew Fischer
Pamela and Kenneth Jean
John J. Cloherty, III
Regina M. Ryan
Michael Akerson and Andrew J. Gambaccini